

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------------------|---|----------------------------------|
| In re HOLLINGER INTERNATIONAL, INC. |) | Cons. Civil Action No. 04-C-0834 |
| SECURITIES LITIGATION, |) | |
| |) | JUDGE DAVID H. COAR |
| _____ |) | |
| This Document Relates To: |) | |
| |) | |
| ALL ACTIONS. |) | <u>CLASS ACTION</u> |
| |) | |

**SETTLEMENT CLASS REPRESENTATIVES' ASSENTED TO
MOTION FOR FINAL APPROVAL OF THE SETTLEMENT AND
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

Pursuant to Federal Rules of Civil Procedure 23(e) and 54(b), the Settlement Class Representatives,¹ on behalf of themselves and all other purchasers of securities of Hollinger International, Inc. (“Hollinger International”) and/or Hollinger, Inc. between and including August 13, 1999 and March 31, 2003 (the “Settlement Class”), with the consent of all Defendants, respectfully move the Court for an order granting: (1) final approval of the parties’ proposed settlement set forth in the Stipulation of Settlement dated as of July 26, 2007, and the Addendum thereto dated as of April 14, 2008 (collectively, the “Stipulation”), attached as Exhibits A and B to the Declaration of John C. Kairis, dated June 4, 2009 (“Kairis Declaration”), resolving this class action and the related Canadian class actions styled: (a) *Bethel v. Black*, Q.B. No. 1492 of 2004 in the Court of Queen’s Bench, Judicial Center of Saskatoon, in the Province of Saskatchewan, Canada; (b) *Drover v. Argus Corporation*, File No. 04-CV-028649 in the Superior Court of Justice of Ontario, Canada; and (c) *Bethel v. Black*, No.550-06-000014-051,

¹ Lead Plaintiff Teachers' Retirement System of Louisiana and named plaintiffs Washington Area Carpenters Pension and Retirement Fund, Cardinal Mid-Cap Value Equity Partners, L.P. and E. Dean Carlson were preliminarily appointed Settlement Class Representatives pursuant to the Preliminary Approval Order.

in the Superior Court, Province of Quebec, Canada; (2) final approval of the Plan of Allocation attached as Exhibit H to the Kairis Declaration; and (3) final certification of the proposed Settlement Class. Co-Lead Counsel further move the Court to grant their application for an award of attorneys' fees and reimbursement of costs and expenses incurred in prosecuting the claims in this action, and the costs and expenses incurred by the Claims Administrator in mailing and publishing the Class Notices and Proof of Claim forms and administering the Settlement, plus interest earned on those amounts at the same rate earned by the Settlement amount.

The grounds for this Motion are set forth in the accompanying Memorandum of Law In Support Of Motion For Final Approval Of The Class Action Settlement With All Defendants; the Declarations of John C. Kairis, Travis E. Downs, III, Carol V. Gilden, Roy A. Mongrue, Jr., John T. DeCarlo, David Kessler, Michael B. Miller, and Bruce McNew, and the exhibits thereto; Co-Lead Counsel's Memorandum of Law In Support Of Award Of Attorneys' Fees And Reimbursement of Expenses; and all other pleadings and papers on file in this Action.

DATED: June 4, 2009

Respectfully submitted,

/s/ John C. Kairis

COHEN MILSTEIN SELLERS & TOLL
PLLC
Carol V. Gilden
39 South LaSalle Street, Suite 1100
Chicago, Illinois 60603
Telephone: (312) 357-0370
Facsimile: (312) 357-0368
Liaison Counsel for the Settlement Class

GRANT & EISENHOFER P.A.
Jay W. Eisenhofer
John C. Kairis
Chase Manhattan Centre
1201 North Market Street
Wilmington, Delaware 19801
Telephone: (302) 622-7000
Facsimile: (302) 622-7100
Attorneys for Teachers' Retirement System of Louisiana,
Cardinal Mid-Cap Value Equity Partners, L.P. and Co-
Lead Counsel for the Settlement Class

COUGHLIN STOIA GELLER RUDMAN & ROBBINS
LLP

Darren J. Robbins

Travis E. Downs, III

Ellen Gusikoff Stewart

655 West Broadway, Suite 1900

San Diego, CA 92101

Telephone: (619) 231-1058

Facsimile: (619) 231-7423

Attorneys for Washington Area Carpenters Pension and
Retirement Fund, Cardinal Mid-Cap Value Equity
Partners, L.P. and Co-Lead Counsel for the Settlement
Class